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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

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JEREMY TYSON,)	Case No. 2:18-mj-0047-PAL
)	
DEANDRE SPENCER, and)	Stipulation to Continue
)	the Preliminary Hearing
SHAKEYA JOSEPH,)	(<i>First Request</i>)
)	
Defendants.)	

IT IS HEREBY STIPULATED AND AGREED, by and between DAYLE ELIESON, United States Attorney, and CRISTINA D. SILVA, Assistant United States Attorney, counsel for the United States of America, RACHEL KORENBLAT, ESQ., counsel for Defendant JEREMY TYSON, RICHARD A. WRIGHT, ESQ., counsel for Defendant DEANDRE SPENCER and WILLIAM H. BROWN, ESQ., counsel for SHAKEYA JOSEPH, that the preliminary hearing date in the above-captioned matter, currently scheduled for January 29, 2018, at 4:00 pm, be vacated to a date and time convenient to this Honorable Court but in any event no sooner than 30 days.

This stipulation is entered into for the following reasons:

1. The parties have initiated discussions regarding possibly resolving the case pre-indictment. Additional time is needed for defense counsel to receive and review the discovery in order to engage in negotiations.

2. The parties agree to the continuance.

3. Defendant SPENCER is incarcerated, but does not object to the continuance. Defendants TYSON and JOSEPH are released on a personal recognizance bond and do not object to the continuance.

4. Additionally, denial of this request for continuance could result in a miscarriage of justice.

5. The additional time requested herein is not sought for purposes of delay, but to allow for a potential pre-indictment resolution of the case.

6. The additional time requested by this stipulation, is allowed, with the defendant's consent under the Federal Rules of Procedure 5.1(d).

7. This is the first request for a continuation of the preliminary hearing.

DATED this 23rd day of January, 2018.

Respectfully submitted,
DAYLE ELIESON
United States Attorney

//s// Rachel M. Korenblat
RACHEL M. KORENBLAT
Counsel for Defendant, JEREMY TYSON

//s// Cristina D. Silva
CRISTINA D. SILVA
Assistant United States Attorney

//s// Richard A. Wright
 RICHARD A. WRIGHT
 Counsel for Defendant, DEANDRE SPENCER

//s// William H. Brown
WILLIAM H. BROWN
Counsel for the Defendant, SHAKEYA JOSEPH

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ORDER

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. The parties have initiated discussions regarding possibly resolving the case pre-indictment. Additional time is needed for defense counsel to receive and review the discovery in order to engage in negotiations.
2. The parties agree to the continuance.
3. Defendant SPENCER is incarcerated, but does not object to the continuance. Defendants TYSON and JOSEPH are released on a personal recognizance bond and do not object to the continuance.
4. Additionally, denial of this request for continuance could result in a miscarriage of justice.
5. The additional time requested herein is not sought for purposes of delay, but to allow for a potential pre-indictment resolution of the case.

